

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION**

JENNIFER VETRANO,
Plaintiff,

v.

JOHN BRDA, ALLISON CHRISTILAW,
MBA, ICD.D B, JOHN R. HARDING, UZI
SASSON, DAN EATON ESQ, MAURICE
GUITTON, ERIC M. LESLIE, PHILIPPE
MORALI, KEN HANNAH, STEEN
KARSBO, JOHN DOES 1-20, JANE DOES 1-
20,
Defendants.

CASE NO. 7:24-CV-00325-DC-RCG

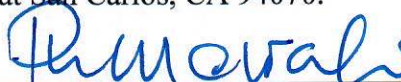
DECLARATION OF PHILIPPE MORALI

I, PHILIPPE MORALI, declare and state as follows:

1. I served on the Board of Directors of Meta Materials from October 10, 2023 until it filed for bankruptcy on August 7, 2024.
2. I was never employed by Torchlight Energy Resources.
3. I was not employed at Torchlight Energy Resources or Meta Materials during the time Plaintiff alleges a “pump-and-dump” scheme by former Torchlight Energy Resources and Meta Materials executives occurred, and I had no involvement in any of the alleged conduct.
4. I currently reside in California.
5. I have never lived in Texas.
6. I do not work in Texas.
7. I do not own personal or real property in Texas.
8. I do not maintain a bank account in Texas.

9. I do not conduct any personal business in Texas.
10. I have never entered into a contract in my individual capacity that was performable in whole or in part in Texas.
11. I do not have a telephone number listing in Texas.
12. I have never paid real estate or income taxes in Texas.
13. I have not traveled to Texas for personal reasons since at least the year 2000.
14. I have never traveled to Texas to conduct business on behalf of Meta Materials.
15. Meta Materials has never maintained an office in Texas.
16. Meta Materials is incorporated in the state of Nevada, and its principal place of business is in Nevada.
17. All management decisions made on behalf of Meta Materials have been made in Nevada.
18. Meta Materials did not historically maintain a registered agent for service of process in Texas.
19. I am not a social media influencer. I have never made a social media post about Meta Materials.

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed on March 20, 2025, at San Carlos, CA 94070.



PHILIPPE MORALI